

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Jonathan Leite,

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Plaintiff

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*

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v.

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Case No. 1:15-cv-00280-PB

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Corrections Officers Matthew Goulet,

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Elmer Van Hoesen, Michael Beaton, Lynn McLain,*

Heather Marquis, Trevor Dube, Rhianne Snyder,

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Eddy L'Heureux, Jeffrey Smith, Dwane Sweatt,

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Yair Balderrama, Bob Morin, Ejike Esobe, and

*

Kathy Bergeron

*

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Defendants

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AFFIDAVIT OF MEGAN DOUGLASS, ESQ.

NOW COMES Megan Douglass, Esq., who upon her oath does depose and say:

1. I am a resident of New Hampshire, and I am employed as an associate attorney with Douglas, Leonard, and Garvey, PC, plaintiff's counsel in the above-captioned matter.

2. I have been working with Attorney Benjamin King in representation of the plaintiff in the instant matter.

3. In that capacity, I have witnessed the depositions of Northern New Hampshire Correctional Facility Correctional Officers, Kathleen Duchesne (f/k/a Bergeron) and Trevor Dube.

4. I have also overseen certain aspects of discovery, to include reviewing video recordings produced by the defendants and showing Northern New Hampshire Correctional Facility F Block on August 24, 2012.

5. The video recordings are date and time-stamped.

6. One video recording shows Kathleen Duchesne enter F Block through a door on the lower tier at 15:40:18 PM.

7. Officer Duchesne walks to her right on the lower tier of F Block, disappearing from view at 15:40:31.

8. At 15:40:48 Officer Duchesne appears again, near where she disappeared. She is facing the camera and walking toward the camera.

9. Officer Duchesne continues walking toward the camera, past six cell doors on her right.

10. Officer Duchesne walks past the camera and out of view at 15:41:05.

FURTHER THE AFFIANT SAYETH NOT.

Date: December 18, 2017

/s/ Megan E. Douglass
Megan E. Douglass

STATE OF NEW HAMPSHIRE
MERRIMACK, SS.

On this 18th day of December, 2017, Megan E. Douglass personally appeared before me and gave solemn oath that the foregoing is true and accurate to the best of her knowledge and belief.

Before me,

/s/ Susan A. Mello
Notary Public
My Commision Expires: 01/18/22